

1 ERIC P. ISRAEL, #132426
2 EPI@LNBYG.COM
3 LEVENE, NEALE, BENDER, YOO &
4 GOLUBCHIK L.L.P.
5 2818 La Cienega Avenue
6 Los Angeles, CA 90034
7 Phone: 310-229-1234

8 Attorneys for JEFFREY I. GOLDEN, Trustee

9 D. EDWARD HAYS, #162507
10 ehays@marshackhays.com
11 BRADFORD N. BARNHARDT, #328705
12 bbarnhardt@marshackhays.com
13 MARSHACK HAYS WOOD LLP
14 870 Roosevelt
15 Irvine, CA 92620
16 Telephone: (949) 333-7777
17 Facsimile: (949) 333-7778

18 Attorneys for Creditor,
19 HOUSER BROS. CO. dba RANCHO DEL
20 REY MOBILE HOME ESTATES

21 UNITED STATES BANKRUPTCY COURT

22 CENTRAL DISTRICT OF CALIFORNIA – SANTA ANA DIVISION

23 In re

24 JAMIE LYNN GALLIAN,

25 Debtor.

Case No. 8:21-bk-11710-SC

Chapter 7

DECLARATION OF GREGORY A.
PEPLIN RE GOOD FAITH PURCHASER
FINDING ON CHAPTER 7 TRUSTEE'S
MOTION TO AUTHORIZE SALE OF
MANUFACTURED HOME CURRENTLY
LOCATED AT 16222 MONTEREY LANE,
SPACE 376, HUNTINGTON BEACH, CA
92649, DECAL NO. LBM1081, FREE AND
CLEAR OF LIENS AND HOMESTEAD
EXEMPTION (DOCKET NO. 539)

Date: March 4, 2025
Time: 11:00 a.m.
Ctvm: 5C

26
27 ///

1 TO THE HONORABLE SCOTT C. CLARKSON, UNITED STATES BANKRUPTCY JUDGE,
2 THE DEBTOR AND HER COUNSEL OF RECORD, AND ALL INTERESTED PARTIES:

3 Houser Bros. Co., dba Rancho Del Rey Mobile Home Estates ("Houser Bros.") and Jeffrey I.
4 Golden solely in his capacity as Chapter 7 Trustee ("Trustee") of the bankruptcy estate of Jamie
5 Lynn Gallian, jointly submit the attached Declaration of Gregory A. Peplin re: Good Faith Purchaser
6 Finding on Chapter 7 Trustee's Motion to Authorize Sale of Manufactured Home currently located
7 at 16222 Monterey Lane, Space 376, Huntington Beach, CA 92649, Decal No. LBM1081, Free and
8 Clear of Liens and Homestead Exemption (Docket No. 539).

9 DATED: March 7, 2025

MARSHACK HAYS WOOD LLP

10
11 By: /s/ Bradford N. Barnhardt
12 D. EDWARD HAYS
13 BRADFORD N. BARNHARDT
14 Attorneys for Creditor,
15 HOUSER BROS. CO. dba RANCHO DEL
16 REY MOBILE HOME ESTATES
17
18
19
20
21
22
23
24
25
26
27
28

DECLARATION

ERIC P. ISRAEL (State Bar No. #132426)
EPI@LNBYG.COM
LEVENE, NEALE, BENDER, YOO &
GOLUBCHIK L.L.P.
2818 La Cienega Avenue
Los Angeles, CA 90034
Phone: 310-229-1234

Attorneys for Jeffrey I. Golden, Trustee

UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
SANTA ANA DIVISION

In re
JAMIE LYNN GALLIAN,
Debtor.

Case No. 8:21-bk-11710-SC
Chapter 7

DECLARATION OF GREGORY A. PEPLIN RE GOOD FAITH PURCHASER FINDING ON CHAPTER 7 TRUSTEE'S MOTION TO AUTHORIZE SALE OF MANUFACTURED HOME CURRENTLY LOCATED AT 16222 MONTEREY LANE, SPACE 376, HUNTINGTON BEACH, CA 92649, DECAL NO. LBM1081, FREE AND CLEAR OF LIENS AND HOMESTEAD EXEMPTION (DOCKET NO. 539)

Date: March 4, 2025
Time: 11:00 a.m.
Ctrm: 5C

DECLARATION OF GREGORY A. PEPLIN

I, Gregory A. Peplin, declare as follows:

1. I am an individual over 18 years of age and competent to make this Declaration.
2. The facts set forth below are true of my personal knowledge. If called upon to do so, I could and would competently testify as to the facts set forth in this Declaration.
3. I make this declaration in support of the request by Jeffrey I. Golden, the Chapter 7 Trustee (the "Trustee") for the estate of Jamie Lynn Gallian (the "Debtor"), for a good faith purchaser finding in the Trustee's Motion to Authorize Sale of Manufactured Home Currently

1 Located at 16222 Monterey Lane, Space 376, Huntington Beach, Ca 92649, Decal No. LBM1081,
2 Free and Clear of Liens and Homestead Exemption (Docket No. 539) (the “Sale Motion”).

3 4. On or about February 26, 2025, I made an overbid at \$276,000 (the “Overbid”),
4 through Coldwell Banker Realty (“Coldwell Banker”), the Trustee’s real estate brokers, for a 2014
5 Skyline Custom Villa manufactured home, decal no. LBM 1081 (the “Property”) currently located at
6 16222 Monterey Lane, Space #376, Huntington Beach, California 92649 (the “Space”). The
7 Overbid was for all cash with no contingencies. I also provided the Trustee with a bank statement
8 reflecting enough funds to pay cash at that price.

9 5. I have received and review a copy of the Sale Motion. I understand that the sale will
10 be subject to all of the terms and conditions in that motion other than price. I also understand that
11 the Trustee is not selling the Space and that I will need to apply to the park association for a new
12 lease.

13 6. I attended by Zoom the sale hearing on March 4, 2025, at 11:00 a.m. The Trustee
14 called for overbidders, and I understand that my Overbid was the highest bid for the Property. The
15 Court ultimately took the Sale Motion under submission.

16 7. I make the following disclosures in connection with the Trustee’s request for a good
17 faith purchaser finding for the Overbid:

18 a. Bill Friedman and Greg Bingham of Coldwell Banker Realty were also salespersons
19 representing Jason M. Rund, solely in his capacity as Chapter 7 trustee for the estate
20 of Gregory A. Peplin, case no. 2:24-bk-13645-DS (the “Peplin Trustee”). In that
21 case, the Peplin Trustee sold my real property to a third party, and I received money
22 on account of my homestead exemption in that case. I understand that I must reinvest
23 those proceeds in another home by April 30, 2025, in order to preserve their exempt
24 character.

25 b. Mr. Friedman and Mr. Bingham are not representing me in the proposed sale by the
26 Trustee of the Property at bar – they instead are only representing the Trustee.
27 Instead, I am represented by Galaxy Homes LLC (“Galaxy”). Galaxy was also the
28 stalking horse buyer.

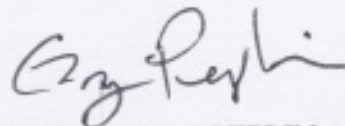
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20

8. Except for my interest in overbidding on the Property, and the matters disclosed in paragraph 7 above, I have no relationship with the Debtor, the Trustee or any of the professionals in this case. I was advised of the Property by the Brokers and my real estate broker, David Guarino of Galaxy Homes. Before being referred to the Property, I had no knowledge of or dealings with the Debtor, this bankruptcy case or the Trustee.

9. There are no undisclosed terms to the sale.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed at La Verne, California, on March __, 2025.


GREGORY A. PEPLIN

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
870 Roosevelt, Irvine, CA 92620

A true and correct copy of the foregoing document entitled: DECLARATION OF GREGORY A. PEPLIN RE GOOD FAITH PURCHASER FINDING ON CHAPTER 7 TRUSTEE'S MOTION TO AUTHORIZE SALE OF MANUFACTURED HOME CURRENTLY LOCATED AT 16222 MONTEREY LANE, SPACE 376, HUNTINGTON BEACH, CA 92649, DECAL NO. LBM1081, FREE AND CLEAR OF LIENS AND HOMESTEAD EXEMPTION (DOCKET NO. 539) will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On *(date)* March 7, 2025, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:
☒ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL: On March 7, 2025, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

DEBTOR

JAMIE LYNN GALLIAN
16222 MONTEREY LN UNIT 376
HUNTINGTON BEACH, CA 92649

SECURED CREDITOR

J-PAD, LLC
ATTN: OFFICER, A MANAGING OR GENERAL AGENT, OR
TO ANY OTHER AGENT AUTHORIZED BY APPOINTMENT
OR LAW TO RECEIVE SERVICE OF PROCESS
4519 PONDEROSA WAY
YORBA LINDA, CA 92886

☐ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL: Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on March 7, 2025, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

VIA PERSONAL DELIVERY

PRESIDING JUDGE'S COPY

HONORABLE SCOTT C. CLARKSON
UNITED STATES BANKRUPTCY COURT, CENTRAL DISTRICT OF CALIFORNIA
RONALD REAGAN FEDERAL BUILDING AND COURTHOUSE
411 WEST FOURTH STREET, SUITE 5130 / COURTROOM 5C
SANTA ANA, CA 92701-4593

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

March 7, 2025

Date

Cynthia Bastida

Printed Name

/s/ Cynthia Bastida

Signature

1. **TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** CONTINUED:

- **ATTORNEY FOR CREDITOR AND PLAINTIFF HOUSER BROS. CO.:** Bradford Barnhardt
bbarnhardt@marshackhays.com, bbarnhardt@ecf.courtdrive.com, kfrederick@ecf.courtdrive.com
- **ATTORNEY FOR DEBTOR:** Christopher L Blank chris@chrisblanklaw.com
- **ATTORNEY FOR TRUSTEE JEFFREY I GOLDEN (TR):** Aaron E DE Leest adeleest@DanningGill.com,
danninggill@gmail.com; adeleest@ecf.inforuptcy.com
- **ATTORNEY FOR CREDITOR AND PLAINTIFF THE HUNTINGTON BEACH GABLES HOMEOWNERS' ASSOCIATION:** Robert P Goe kmurphy@goeforlaw.com, rgoe@goeforlaw.com; goeforecf@gmail.com
- **CHAPTER 7 TRUSTEE JEFFREY I GOLDEN (TR):** Jeffrey I Golden (TR lwerner@wgllp.com,
jig@trustesolutions.net; kadele@wgllp.com
- **ATTORNEY FOR CREDITOR AND PLAINTIFF HOUSER BROS. CO. and CREDITOR HOUSER BROS. CO. DBA RANCHO DEL REY MOBILE HOME ESTATES:** D Edward Hays ehays@marshackhays.com,
ehays@ecf.courtdrive.com; kfrederick@ecf.courtdrive.com; cmendoza@marshackhays.com;
cmendoza@ecf.courtdrive.com
- **ATTORNEY FOR CREDITOR AND PLAINTIFF THE HUNTINGTON BEACH GABLES HOMEOWNERS' ASSOCIATION:** Brandon J Iskander biskander@goeforlaw.com, kmurphy@goeforlaw.com
- **ATTORNEY FOR TRUSTEE JEFFREY I GOLDEN (TR):** Eric P Israel eisrael@DanningGill.com,
danninggill@gmail.com; eisrael@ecf.inforuptcy.com
- **INTERESTED PARTY:** Shantal Malméd shantal.malmed@gmlaw.com, cheryl.caldwell@gmlaw.com
- **ATTORNEY FOR CREDITOR AND PLAINTIFF HOUSER BROS. CO. and CREDITOR HOUSER BROS. CO. DBA RANCHO DEL REY MOBILE HOME ESTATES:** Laila Masud lmasud@marshackhays.com,
lmasud@ecf.courtdrive.com; kfrederick@ecf.courtdrive.com
- **ATTORNEY FOR DEFENDANT RANDALL L NICKEL:** Mark A Mellor mail@mellorlawfirm.com,
mellormr79158@notify.bestcase.com
- **INTERESTED PARTY COURTESY NEF:** Valerie Smith claims@recoverycorp.com
- **U.S. TRUSTEE:** United States Trustee (SA) ustpreion16.sa.ecf@usdoj.gov